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13 *Attorneys for Plaintiffs Theresa Beiner and*
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Inc., et al., No. 3:18-CV-1953
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15 UNITED STATES DISTRICT COURT
16
NORTHERN DISTRICT OF CALIFORNIA

17 LAUREN PRICE, on behalf of herself and
all others similarly situated,

18 Plaintiffs,

19 v.

20 FACEBOOK, INC., and CAMBRIDGE
ANALYTICA, LLC

21 Defendants.

CASE NO. 3:18-CV-01732-VC

PLAINTIFFS THERESA BEINER AND
BRANDON HAUBERT'S NOTICE OF
RELATED CASES AND
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER CASES SHOULD
BE RELATED

(Civil L.R. 3-12(b) and 7-11)

Action Filed: March 20, 2018

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 Pursuant to Rule 3-12(b) and Rule 7-11 of the Civil Local Rules, plaintiffs Theresa Beiner
 3 and Brandon Haubert in *Beiner, et al. v. Facebook, Inc., et al.*, No 3:18-CV-1953 (N.D. Cal.)
 4 (“Beiner Action”), respectfully move the Court to consider whether their action is related to five
 5 cases in this District, *Price v. Facebook, Inc., et al.*, Case No. 3:18-cv-01732 (filed March 20,
 6 2018) (“Price Action”), *Rubin v. Facebook, Inc., et al.*, Case No. 3:18-cv-01852 (filed March 26,
 7 2018) (“Rubin Action”), *Gennock et al. v. Facebook, Inc., et al.*, Case No. 4:18-cv-01891 (filed
 8 March 27, 2018) (“Gennock Action”), *O’Kelly v. Facebook, Inc., et al.*, Case No. 3:18-cv-01915
 9 (filed March 28, 2018) (“O’Kelly Action”), and *Haslinger v. Facebook, Inc., et al.*, Case No.
 10 4:18-cv-01984-YGR (filed March 30, 2018) (“Haslinger Action”).

11 1. Under Local Rule 3-12(a), actions are related to another when: “(1) The actions
 12 concern substantially the same parties, property, transaction or event; and (2) It appears likely that
 13 there will be an unduly burdensome, duplication of labor and expense or conflicting results if the
 14 cases are conducted before different Judges.” The Beiner Action should be related to the Price
 15 Action, the Rubin Action, the Gennock Action, the O’Kelly Action, and the Haslinger Action as
 16 these cases concern the same or similar parties, i.e., Facebook, Inc. (“Facebook”) and Cambridge
 17 Analytica, LLC (“Cambridge”). All actions relate to the massive unauthorized exfiltration of
 18 Facebook user data for use by Cambridge Analytica for “psychometric” targeted advertising
 19 during the 2016 presidential election campaign. Generally, plaintiffs in the Actions allege that
 20 Facebook allowed unauthorized individuals to gain access to its data network storing the private
 21 personal information of more than 100 million United States consumers. The exfiltrated
 22 information was used to create targeted advertising for what has been described as a campaign of
 23 “psychological warfare” during the 2016 presidential election. All of the Actions allege violations
 24 of various state and federal statutes and common law principles against Facebook relating to its
 25 harmful policies and conduct and all seek certification of a similar class of victims. Also related
 26 to these actions, on March 29, 2018, Plaintiffs in the Beiner Action filed a Motion for Transfer of
 27 Actions to the Northern District of California for Consolidation Pursuant to 28 U.S.C. §1407
 28 before the U.S. Judicial Panel on Multi-District Litigation. That motion was accepted for filing,

1 as MDL Number 2843, on March 30, 2018.

2 2. Because the Beiner Action, the Price Action, the Rubin Action, the Gennock
3 Action, the O'Kelly Action and the Haslinger Action "concern substantially the same parties,
4 property, transaction or event," these actions are related within the meaning of Civil Local Rule
5 3-12(a)(1). As a result, this will promote efficiency and judicial economy and will avoid "unduly
6 burdensome duplication of labor and expense or conflicting results." Civ. L.R. 3-12(a)(2).

7 Accordingly, the Court should grant this administrative motion and issue the
8 accompanying proposed order holding that:

- 9 (1) The Beiner Action, the Price Action, the Rubin Action, the Gennock Action, the
10 O'Kelly Action, and the Haslinger Action are related under Civil Local Rule 3-
11 12(a); and
12 (2) The related actions should be assigned to this Court's calendar under Civil Local
13 Rule 3-12(f).

14 Pursuant to Civil L.R. 3-12 and 7-11, an Administrative Motion to Relate Case is
15 contemporaneously being lodged and served in the Price Action, the Rubin Action, the Gennock
16 Action, the O'Kelly Action and the Haslinger Action.

17 Dated: April 2, 2018

18 By: /s/ Hank Bates

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15 *Facebook, Inc., et al., No. 3:18-CV-1953*

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